

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

AUG 27 2020

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZYREN TURNAGE,

Defendant.

4:20CR456 SRC/SPM

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Michael K. Hayes, Special Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. The defendant is charged with Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1), an offense for which a maximum 10-year imprisonment is prescribed under Title 18.
2. According to St. Louis Metropolitan Police Department complaint number 20-029377, on July 6, 2020, an SLMPD officer observed a vehicle travel through a red light at a downtown St. Louis intersection. The officer engaged brief pursuit with lights and sirens, but desisted after it became clear the suspect vehicle was not stopping. After disengaging pursuit, the officer observed the vehicle travel through another red light and cause an accident at the intersection of Market Street and 8<sup>th</sup> Street. Defendant fled on foot, and was found a short distance away, hiding in a bush, with a magazine filled with 9mm ammunition. A firearm was recovered from the suspect vehicle, and is described as an SCCY Industries 9mm semi-automatic pistol. It was found without

its magazine. Defendant was Mirandized and asked whether he had a firearm on his person. He responded that the firearm was in the vehicle. The magazine on Defendant's person matched the firearm in the vehicle.

3. Defendant's criminal history began at a young age, and includes convictions for Armed Home Invasion, Burglary, Theft, Aggravated Battery with a Firearm, Felon in Possession of a Firearm, and Felony Property Damage. His criminal history, and the nature and circumstances of the offense charged, indicate that defendant poses a serious danger to the community if released.

4. Due to the weight of the evidence against defendant and defendant's history and characteristics, there is a serious risk that the defendant will flee.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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United States Attorney

/s/ Michael K. Hayes

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